

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mark Blunt, Governor • David Childers, Director

www.dnr.mo.gov

DEC 28 2006

Mr. Dan Wall
Project Manager
U.S. EPA, Region VII
901 North 5th Street
Kansas City, KS 66101

RE: Proposed Plan for the West Lake Landfill, Dated June 12, 2006

Dear Mr. Wall:

The Missouri Department of Natural Resources appreciates the opportunity to offer its position on the Proposed Plan for the West Lake Landfill, located in Bridgeton, Missouri. The department has weighed all the alternatives and public health concerns for this site as well as participated in public meetings to hear public concerns and also performed a cursory review of public comments submitted to the department as of the date of this letter.

Before commenting on the Proposed Plan, let me take this opportunity to thank the U.S. Environmental Protection Agency (EPA) for extending the public comment period in order to allow the community to further review and express their questions and concerns on this site. I am also pleased at the level of effort to include the department in all remedial aspects of this site. I look forward to continuing this relationship into the Record of Decision (ROD), as well as the remedial design/remedial action, and the long-term operation and maintenance phases of the project.

The department's final position on the Proposed Plan and the preferred alternative is as follows:

The department has reviewed the proposed plan and, in general, supports remediation that will provide containment and isolation from human receptors and the environment, such as that proposed in Alternative L4 for Operable Unit 1, Alternative F4 for the Buffer Zone, and Alternative 2 for Operable Unit 2. The department also recognizes the need for long-term care and monitoring and insists that a robust and durable stewardship plan be implemented to address this aspect. In order to achieve this, the state has applicable standards that are relevant and appropriate for:

- Closure and long-term care of all portions of the site
- Monitoring and control of gas generated in the waste deposits
- Monitoring of groundwater
- Continued removal of leachate from the formerly active sanitary landfill

In addition, the department offers the following comments for inclusion into the ROD, which will ensure the longevity of the remedy.

- 1) For risk management purposes, the EPA should provide estimates of the number of years needed to reduce toxicity (i.e., radioactivity) and the volume of radiological contamination below levels of health concern (using both dose assessment and risk assessment approaches).



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- 2) Due to the extremely long half-lives of the radionuclides within the landfill, plans for carrying the remedy beyond the 30-year scope for Alternative L4 should be demonstrated to cover the estimated time needed to reduce the radioactivity below levels of concern.
- 3) The performance of the concrete rubble used in the final landfill cover design should be evaluated and reported to ensure integrity of the cap in perpetuity.
- 4) Trigger criteria based on long-term monitoring data, such as newly detected groundwater contamination, should be set forth within the ROD, which potentially requires additional investigation and/or remedy modification discussions. The five-year review events would be an effective tool in the collection and evaluation process for any such future decision-making efforts.
- 5) To supplement the five-year reviews, an agreement with the United States Army Corps of Engineers and the Earth City Levee District should be developed to perform regular inspections and maintenance of the levee system surrounding the West Lake Landfill.

The department sees all these as important aspects of a successful Long-Term Stewardship Program.

As we are progressing toward development of the remedial design, it is important to keep in mind the amount of time that the institutional and engineering controls will need to be in place and functioning according to the design specifications, in order for them to be protective of human health well into the future. The department is ready to assist and participate in reviewing all decision documents and design plans prior to finalization to ensure that they meet the substantive current state regulations and standards, as well as meeting the stewardship aspects of protectiveness and longevity demands.

We understand that the EPA will now compose the Responsive Summary to public comments received and then develop the ROD. We look forward to reviewing and commenting on the ROD in the near future. If you have any questions or need clarification on any of the comments submitted, please contact Mr. Larry Erickson of my staff at (573) 751-3907. Direct any written inquiries to Mr. Erickson or me at P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY



Daniel R. Schuette
Director

DRS:sma

Enclosure

c: Mr. Robert Geller, Hazardous Waste Program
Mr. Larry Erickson, Federal Facilities Section

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bc: Mr. Gale Carlson, Department of Health and Senior Services
Mr. Terry Hawkins, Division of Geology and Land Survey
Mr. Jim Hull, Solid Waste Management Program
Mr. Jim Kavanagh, Air Pollution Control Program
Mr. Refaat Mefrakis, Water Protection Program



West Lake Landfill St. Louis County Bridgeton, MO

This map shows the location of the West Lake Landfill and the Operable Units of the site.

The geographic location of the landfill is given as follows:

Latitude 38°46'11"
Longitude -90°26'44"

The address of the site is
13570 St. Charles Rock Road
St. Louis, MO 63044



Landfill Areas

- West Lake Landfill Boundary
- Operable Unit 1 - Area 1
- Operable Unit 1 - Area 2
- Operable Unit 2 - Closed Demolition Landfill
- Operable Unit 2 - Inactive Landfill
- Operable Unit 2 - Recently Closed Sanitary Landfill



Missouri Department of Natural Resources
Division of Environmental Quality
Hazardous Waste Program
Created by Shawn Moenks August 18, 2006

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